

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISON**

JENNILYN SALINAS, LINDSEY
NGUYEN, DEANNA LORRAINE, et
al.

Plaintiffs.

V.

NANCY PELOSI, MITCH
McCONNELL, CHUCK SCHUMER,
MARK ZUCKERBERG, et al.

Defendants.

CIVIL ACTION NO. 6:21-CV-162

JURY TRIAL REQUESTED

**STIPULATION OF VOLUNTARY
DISMISSAL OF DEFENDANTS UNDER RULE 41(a)(1)(A)(ii)**

COME NOW, Jennilyn Salinas, Lindsey Nguyen, Deanna Lorraine, “P.P.,” “D.D.,” “T.M.,” “S.M.,” and “M.L.” (collectively, “Plaintiffs”), by and through their attorney, Paul M. Davis, to file this Stipulation of Voluntary Dismissal of Defendants Under Rule 41(a)(1)(A)(ii) and respectfully represent the following:

1. As described in Exhibit B to Plaintiff's Response to the Motion to Strike (Doc. No. 168-2), Plaintiffs have experienced recent severe setbacks regarding their resources to litigate this lawsuit. Specifically, Plaintiffs had been expecting an influx of financial resources, co-counsel, and staff to litigate this case, which did not materialize. Moreover, one of their own former staff has now represented that he has destroyed evidence Plaintiffs intended to use to establish personal jurisdiction over various non-resident Defendants.

2. After further consideration of the matter, it seem unlikely that Plaintiffs will be able to muster the resources they need and recover much of the evidence they lost within a reasonable amount of time. Accordingly, Plaintiffs have decided to dramatically reduce the scope of this lawsuit to address only the Texas resident Defendants, the DSCC, the DCCC, Mr. Zuckerberg, and Mr. Dorsey for actions specifically directed at Texas, and will leave it to citizens in the other forty-nine states to hold their own officials accountable.

3. Plaintiffs have conferred with counsel for the following Defendants who have stipulated to being dismissed from the case as reflected by the signature of their counsel further below pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii):

- a. The Republican National Committee;
- b. Arkansas Governor Asa Hutchinson and Secretary of State John Thurston;
- c. Ohio Governor Mike DeWine and Secretary of State Frank LaRose;
- d. New Hampshire Governor Chris Sununu and Secretary of State William H. Gardner;
- e. Kansas Governor Laura Kelly and Secretary of State Scott Schwab.

4. Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), Plaintiffs hereby voluntarily dismiss the above Defendants by their stipulations as indicated below.

Respectfully submitted this June 30, 2021.

/s/ Paul M. Davis
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STIPULATIONS TO DISMISSAL

Counsel for each Defendant listed below has stipulated to dismissal pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii):

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CERTIFICATE OF SERVICE

I certify that I have served the foregoing motion on all counsel of record who have made appearances in this action to date via the court's ECF notification system.

/s/ Paul M. Davis

Paul M. Davis